

**REDACTED – FOR PUBLIC INSPECTION**

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**VIA COURIER AND ECFS**

July 24, 2012

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Connect America Fund*, WC Docket No. 10-90; *High-Cost Universal Service Support*,  
WC Docket No. 05-337

Dear Ms. Dortch:

Windstream Corporation, on behalf of its incumbent local exchange carrier affiliates (hereinafter “Windstream”), submits the enclosed Election and Petition for Waiver. By this document, Windstream elects to accept \$653,325 in incremental support under Phase I of the Connect America Fund (“CAF”) and conditionally accepts \$59,750,985, the remainder of the support allocated to its service territory, to the extent its Petition for Waiver is granted.

As described in greater detail in that Petition, Windstream requests that the Commission waive Section 54.312(b)(2) of the rules to the extent it requires a price cap carrier to deploy broadband to one unserved location for every \$775 in incremental support, so long as the carrier (1) first deploys 4 Mbps service to all unserved locations where \$775 in incremental support is sufficient to make an economic case for deployment and, after that, (2) spends additional, specified levels of funding on the deployment of second-mile fiber facilities that will enable broadband access at speeds of at least 4 Mbps downstream and 768 Kbps upstream for unserved consumers.

If the waiver is granted, it would permit Windstream to use all of its allocated CAF Phase I funding to extend 1,688 miles of fiber-optic, second-mile infrastructure into remote areas of 15 states, and bring robust broadband service to 16,981 locations that today lack any broadband access. If the waiver is not granted, Windstream can only accept a small fraction of its funding allocation to reach 843 unserved locations, and many thousands of rural Americans will be denied the benefits of broadband for several more years notwithstanding the availability of more than \$59 million that could be used to deliver service much sooner.

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Associated with this cover letter are the following documents:

- Windstream Election and Petition for Waiver
- Attachment 1 -- .csv file identifying, by 2010 Census Block FIPS code and wire center CLLI code, the locations where Windstream will deploy broadband service in satisfaction of its requirements if the Petition for Waiver is not granted
- Attachment 2 -- .csv file identifying, by wire center CLLI code, the locations where Windstream will deploy broadband service in satisfaction of its requirements if the Petition for Waiver is granted
- Attachment 3 – Certification required by 47 C.F.R. § 54.312(b)
- Attachment 4 – Requested distribution of funding to Windstream’s ILEC subsidiaries in the events that the Petition for Waiver is and is not granted
- Attachment 5 – Summary of Election and Conditional Election
- Attachment 6 – Declaration of Mike Skudin

Windstream submits Attachments 1 and 2 pursuant to the Protective Order in CC Docket No. 01-92, WC Docket Nos. 05-337, 07-135, and 10-90 and GN Docket No. 09-51 (DA 10-1749, rel. Sept. 16, 2010) (Protective Order). This confidential treatment is required to protect proprietary and confidential information about Windstream’s network. Pursuant to the Protective Order, Windstream is submitting to the Secretary one copy of the Stamped Confidential Document—a CD-ROM with both attachments, labeled “CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135, 10-90, AND GN DOCKET NO. 09-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION”—and two copies of the Redacted Confidential Document, as defined in the Protective Order. Windstream also is sending two copies of the Stamped Confidential Document to Ms. Lynne Hewitt Engledow, Pricing Policy Division, Wireline Competition Bureau, and is filing the Redacted Confidential Document electronically via ECFS.

Please feel free to contact me if you have any questions or need any more information.

Sincerely yours,

/s/ Eric N. Einhorn

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cc: Amy Bender  
Joe Cavender  
Alabama Public Service Commission  
Arkansas Public Service Commission  
Florida Public Service Commission  
Georgia Public Service Commission  
Iowa Utilities Board  
Kentucky Public Service Commission  
Missouri Public Service Commission  
Mississippi Public Service Commission  
North Carolina Utilities Commission  
Nebraska Public Service Commission  
New Mexico Public Regulation Commission  
Public Utilities Commission of Ohio  
Oklahoma Corporation Commission  
Pennsylvania Public Utility Commission  
Public Utility Commission of Texas  
Cherokee Nation  
Cheyenne-Arapaho Tribes of Oklahoma  
Chickasaw Nation  
Choctaw Nation of Oklahoma  
Citizen Potawatomi Nation  
Jicarilla Apache Nation  
Sac and Fox Tribe of the Mississippi  
Muscogee (Creek) Nation  
Ohkay Owingeh  
Pueblo of Santa Clara